

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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MIDWEST PILOTS MERGER COMMITTEE,

CARL SCHWERMEN, in his Capacity as  
Chairperson of the MIDWEST PILOTS  
MERGER COMMITTEE,

DONALD TILL, in his Individual Capacity and in  
his Capacity as Vice Chairperson of the  
MIDWEST PILOTS MERGER COMMITTEE,

Case No. 14-cv-01441-RTR

and

MARK E. WARD,

Plaintiffs,

-against-

FRONTIER AIRLINES, INC.,

and

FRONTIER AIRLINE PILOTS ASSOCIATION,

Defendants.

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**FRONTIER AIRLINES, INC.'S MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

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Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Frontier Airlines, Inc. ("Frontier") hereby moves for an order dismissing with prejudice the claims against it in the Complaint filed by Plaintiffs Midwest Pilots Merger Committee, Carl Schwermen, Donald Till, and Mark E. Ward (collectively, "Plaintiffs") for failure to state a claim upon which relief can be granted.

WHEREFORE, Frontier respectfully requests that the Court enter an order dismissing Plaintiffs' claims against Frontier with prejudice for failure to state a claim upon which relief can be granted.

Dated: January 16, 2015

Respectfully submitted,

/s/ Jennifer L. Ciralsky  
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